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Attorneys for Plaintiffs
REBEKAH GEARE and RAIN MITCHELL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

REBEKAH GEARE, an individual;
RAIN MITCHELL, an individual; on
behalf of themselves, on behalf of all
others similarly situated, and as
aggrieved employees under the
California Private Attorney General
Act,

Plaintiffs,

v.

LULULEMON USA INC., and DOES
1-100, inclusive,

Defendant.

CASE NO. CV 12-9996-SJO (JEMx)

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT AND APPROVAL OF
PAGA SETTLEMENT**

DATE: September 23, 2013
TIME: 10:00 a.m.
CTRM.: 1

Assigned to the Honorable S. James Otero

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 23, 2013 at 10:00 a.m., before the Honorable S. James Otero in Courtroom 1 of the United States District Court for the Central District of California, 312 N. Spring Street, Los Angeles, California 90012, Plaintiffs Rebekah Geare and Rain Mitchell will and hereby do the Court for an Order:

- A. Preliminarily approving the proposed Class Settlement in this case;
- B. Preliminary certifying the California Class and Nationwide Class for settlement purposes;
- C. Approving the Notice and Claim Form (ECF No. 64, Exs. A-B) and directing that notice be sent to the settlement class members as set forth in the Settlement;
- D. Appointing The Law Office of Andrew J. Sokolowski, The Law Offices of Rhett T. Francisco, and The Law Offices of Pawel R. Sasik as Class Counsel;
- E. Approving KCC Class Action Services, LLC as the Claims Administrator for the Settlement;
- F. Setting a schedule for Final Approval of the Class Settlement; and
- G. Approving the proposed settlement of Plaintiffs' Private Attorneys General Act claims.

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1 The motion will be based on this Notice of Motion and Motion, the
2 concurrently filed Points and Authorities, the Declaration of Andrew J. Sokolowski
3 and attached exhibits, the argument of counsel and upon such other material
4 contained in the file and pleadings.

5 DATED: August 23, 2013

**THE LAW OFFICE OF
ANDREW J. SOKOLOWSKI**

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8 /s/ Andrew J. Sokolowski
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